

Hearing Date and Time: October 25, 2007 at 10:00 a.m.
Response Date and Time: October 18, 2007 at 4:00 p.m.
(extended by agreement of parties)

FOLEY & LARDNER LLP

David G. Dragich (Admitted *pro hac vice*)
500 Woodward Ave., Suite 2700
Detroit, MI 48226
Telephone: (313) 234-7100
Facsimile: (313) 234-2800

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X)	
In re:)	
)	Chapter 11
DELPHI CORPORATION, et al.,)	Case No. 05-44481 (RDD)
)	Jointly Administered
Debtors.)	
-----X		

**RESPONSE OF ATUL PASRICHA TO DEBTORS' TWENTY-FIRST OMNIBUS
OBJECTION PURSUANT TO 11 U.S.C. § 502(B) AND FED. R. BANKR. P. 3007 TO
CERTAIN (A) DUPLICATE OR AMENDED CLAIMS, (B) UNTIMELY EQUITY
CLAIM, (C) INSUFFICIENTLY DOCUMENTED CLAIMS, (D) CLAIMS NOT
REFLECTED ON DEBTORS' BOOKS AND RECORDS, (E) UNTIMELY CLAIMS,
AND (F) CLAIMS SUBJECT TO MODIFICATION, TAX CLAIM SUBJECT TO
MODIFICATION, AND MODIFIED CLAIMS ASSERTING RECLAMATION**

Atul Pasricha ("Pasricha"), by his attorneys Foley & Lardner LLP, hereby submits this Response (the "Response") to the Debtors' Twenty-First Omnibus Objection Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007 to Certain (a) Duplicate or Amended Claims, (b) Untimely Equity Claim, (c) Insufficiently Documented Claims, (d) Claims Not Reflected on Debtors' Books and Records, (e) Untimely Claims, and (f) Claims Subject to Modification, Tax Claim Subject to Modification, and Modified Claims Asserting Reclamation (the "Twenty-First Omnibus Claims Objection"). In support of its Response, Pasricha respectfully represents as follows:

1. The Twenty-First Omnibus Claims Objection addresses Claim Numbers 14019, 14020, 14021, 14022, 14023, 14024, 14025, 14026 filed by Pasricha (the “Claims”). The Claims assert amounts and obligations owed by the Debtors arising out of Pasricha’s employment with the Debtors.

2. The Debtors’ Twenty-First Omnibus Claims Objection seeks to disallow and expunge the Claims on the ground that no liability for the Claims exists according to the Debtors’ Books and Records. The Debtors provide no basis or details to support the Twenty-First Omnibus Claims Objection as it relates to the Claims specifically.

3. Section 502(a) of the Bankruptcy Code and Bankruptcy Rule 3001(f) provide that a properly filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim, unless a party objects. The party objecting to the claim has the burden of going forward and of introducing evidence sufficient to rebut the presumption of validity. In re Wells, 51 B.R. 563 (D. Colo. 1985); Matter of Unimet Corp., 74 B.R. 156 (Bankr. N.D. Ohio 1987). The Debtors have set forth no such evidence. Other than generic and vague representations, the Debtors offer neither evidence nor specific bases to object to the Claims. The Debtors fail to provide any supporting materials to support the Twenty-First Omnibus Claims Objection.

4. The documents supporting the Claims were annexed as exhibits previously filed and submitted. Pasricha will continue to work with the Debtors in an effort to resolve the Claims.

WHEREFORE, Pasricha respectfully requests that the Court enter an order denying the Debtors’ Twenty-First Omnibus Claims Objection with respect to its Claims and award such other and further relief as may be just and proper.

Respectfully submitted,

FOLEY & LARDNER LLP

/s/ David G. Dragich

David G. Dragich (Admitted *Pro Hac Vice*)

500 Woodward Ave., Suite 2700

Detroit, MI 48226

Telephone: (313) 234-7100

Facsimile: (313) 234-2800

Attorneys for Atul Pasricha

Dated: October 23, 2007